



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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*271 Cadman Plaza East  
Brooklyn, New York 11201*

September 12, 2018

***VIA ECF***

Honorable Vera M. Scanlon  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: Kelley Amadei, et al. v. Kirstjen M. Nielsen, et al.  
Case No.: 17-CV-5967 (Garaufis, J.) (Scanlon, M.J.)**

Dear Judge Scanlon:

This Office represents the Defendants, in the above-referenced matter. Defendants write in response to the Court's Order dated August 15, 2018, directing the parties to submit a joint letter setting forth a deposition schedule outline. *See* Dkt. No. 48 (Court's August 15, 2018 Order).

The parties have agreed on the tentative deposition schedule below:

Sept. 20, 2018: Dennis Starr, Immigration and Customs Enforcement Officer

Sept. 27, 2018: Everlyn Pradoguevara, Immigration and Customs Enforcement Officer

Oct. 2, 2018: Rey Rivera Perez, Customs and Border Protection Officer

Oct. 4, 2018: Kelley Amadei, Plaintiff

Oct. 22, 2018: James Bonasoro, Delta Airlines Employee

Oct. 23, 2018: Bryan Hoffman, Delta Airlines Employee

Oct. 25, 2018: Martha Shaffer, Delta Airlines Employee

Oct. 26, 2018: Aimee Walsh, Delta Airlines Employee

Dec. 4, 2018: Carola Cassaro, Plaintiff

Defendants regrettably inform the Court that the parties were unable to submit a truly "joint" letter, as required by the Court's Order because the proposed letter, produced to defense counsel for the first time earlier today, includes discovery arguments, mischaracterizations, and unnecessarily assigns fault for items that have not been fully negotiated. *See* Dkt. No. 51 (Plaintiffs' letter regarding deposition schedule).

Accordingly, Defendants respectfully request until tomorrow to provide a response.

Respectfully submitted,

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cc: All counsel of record via ECF